

VENABLE

VENABLE LLP | 1270 AVENUE OF THE AMERICAS  
24TH FLOOR | NEW YORK, NY 10020  
T +1 212.307.5500 F +1 212.307.5598 Venable.comEdward P. Boyle  
T 212.808.5675  
F 212.307.5598  
epboyle@venable.com

July 15, 2020

**By ECF**

The Honorable Louis L. Stanton  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 7/27/20

Re: Consolazio v. AC2T, Inc., et al., No. 1:20-cv-03477-LLS (S.D.N.Y.)

Dear Judge Stanton:

My firm represents defendants AC2T, Inc. (“AC2T”) and Jeremy Hirsch (“Hirsch”) in the action referenced above. Pursuant to Rule 1.E of Your Honor’s Individual Practices, we respectfully submit this request to set August 31, 2020 as the deadline to respond to the Complaint for all three defendants in this action – AC2T, Hirsch, and defendant Bonner Analytical Testing Co. (“Bonner”) (AC2T, Hirsch, and Bonner together, “Defendants”). Counsel for plaintiff Todd Consolazio (“Plaintiff”) and counsel for Bonner consent to this extension.

By orders entered July 8 and 10, 2020, this Court granted separate requests by AC2T and Bonner to set August 10, 2020 as their deadline to respond to the Complaint. See Dkt. Nos. 13 & 17. Since then, I have accepted service of the Complaint on behalf of Defendant Hirsch (without waiving any other defenses, including personal jurisdiction). Plaintiff has agreed that Hirsch may have until August 31, 2020 to respond to the Complaint. Plaintiff has further agreed to the same deadline for Defendants AC2T and Bonner. Subject to Your Honor’s approval, the parties have also agreed that, if Defendants file any motions to dismiss the Complaint, Plaintiff’s opposition to the motion(s) would be due on September 30, 2020, and Defendants’ reply or replies would be due October 14, 2020.

50  
*Ordered*  
*Louis L. Stanton*  
7/27/20

# VENABLE LLP

---

Hon. Louis L. Stanton

July 15, 2020

Page 2

AC2T and Bonner have previously requested one extension of their time to respond to the Complaint. *See* Dkt. Nos. 11 & 16. Hirsch has not previously requested an extension. There are no other conferences or dates scheduled in this action.

We appreciate the Court's consideration.

Respectfully,

*/s/ Edward P. Boyle*

Edward P. Boyle

cc: Counsel of Record (*via ECF*)